## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. BLR 9004-1(b)

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Attorneys for Movants Arch Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, U.S. Specialty Insurance Company, and XL Specialty Insurance

Company

In re: Chapter 11

Case No. 22-19361 (MBK)

BLOCKFI INC., et al., (Jointly Administered under a Confirmed Plan)

Hearing Date: April 25, 2024 at 11:30 (ET)

Stacey E. Rufe (admitted pro hac vice)

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Debtors. 1 Response Deadline: April 18, 2024 at 4:00 p.m. (ET)

## NOTICE OF MOTION TO ENFORCE PLAN AND CONFIRMATION ORDER

**PLEASE TAKE NOTICE** that, on April 4, 2024, Arch Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, U.S. Specialty Insurance Company, and XL Specialty Insurance Company (collectively, the "Movants") filed the *Motion to Enforce Plan and Confirmation Order* (the "Motion").

The Wind-Down Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

PLEASE TAKE FURTHER NOTICE that any objections or responses to the relief requested in the Motion must be filed on or before April 18, 2024 at 4:00 p.m. (ET) (the "Objection Deadline"). At the same time, copies of any responses or objections to the Motion must be served upon the undersigned counsel to the Movants so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion, which may be conducted telephonically and/or by videoconference, will be held on April 25, 2024 at 11:30 a.m. (ET) before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, in the Bankruptcy Court, Courtroom #8, 402 East State Street, Trenton, NJ 08608.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE MOTION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR HEARING.

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Dated: April 4, 2024 New York, New York Respectfully submitted,

## **DLA PIPER LLP (US)**

/s/ Rachel Ehrlich Albanese

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